Appln. No.: 09/832,825

Response under 37 C.F.R. § 1.116

Mori discloses a halogenated-butyl-rubber-based rubber composition which is resistant to scorching and can give a crosslinked product having small compression set by compounding a halogenated butyl rubber with a specified compound. This composition is prepared by compounding (A) 100 parts by weight of a halogenated butyl rubber with (B) 0.1-30 parts by weight of a hydrotalcite compound, and (C) 1-30 parts by weight of a crosslinking chemical. The hydrotalcite compound B is exemplified by Mg<sub>6</sub>A1<sub>2</sub>(OH)<sub>16</sub>CO<sub>3</sub>·4H<sub>2</sub>O or Mg<sub>4.5</sub>A1<sub>2</sub>(OH)<sub>13</sub>CO<sub>3</sub>·3.5H<sub>2</sub>O. The rubber chemical (C) is exemplified by sulfur, a sulfur compound, a zinc compound, a resin crosslinking agent, an organic peroxide, or a triazine compound. A hydrotalcite compound is incorporated as a retarder to prevent a scorch into a halogenated butyl rubber composition.

Fukumoto discloses that an inside inner liner composition at the carcass side needs to comprise sulfur of 2-8 parts by weight and organic cobalt salt of 0.5-5 parts by weight with respect to rubber of 100 parts by weight. The rubber which is used for the inside inner liner composition is mainly composed of natural rubber, which needs to occupy at least 50% of rubber composition. The inside inner liner composition is arranged to improve the adhesion with steel cord.

In summary, Mori and Fukumoto are different from each other not only because the references use different types of rubber compositions as discussed in the Amendment under 37 C.F.R. § 1.111 filed September 6, 2005, but also because Mori and Fukumoto differ in purpose and the effect of the disclosed inventions. Accordingly, as there is no technical relation

Appln. No.: 09/832,825

Response under 37 C.F.R. § 1.116

between Mori and Fukumoto, even those skilled in the art would not be motivated to combine

the teachings of Mori and Fukumoto.

Kobayashi, Nosu, and the Admitted Prior Art do not make up for the deficiencies of Mori

and Fukumoto.

In view of the foregoing, claim 2 would not be obvious over Mori and Fukumoto and

claim 16 would not be obvious over Mori and Fukumoto further in view of Kobayashi, Nosu,

and the Admitted Prior Art. Accordingly, Applicants respectfully request that the Examiner

reconsider and withdraw the rejections.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

Registration No. 54,257

SUGHRUE MION, PLLC

Telephone: (202) 293-7060

Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: December 21, 2005

3